

Exhibit B

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UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF MICHIGAN

SOUTHERN DIVISION

NATALIE REESER,

Plaintiff,

CASE NO: 2:14-cv-11916

vs.

HENRY FORD HOSPITAL,

Defendant.

/

Volume I of the deposition of NATALIE REESER, taken before me, Lauri A. Sheldon, CSR 4045, RPR, on March 23, 2015, at 39500 High Pointe Boulevard, Suite 350, Novi, Michigan, commencing at or about 10:07 a.m.

APPEARANCES:

MILLER COHEN, P.L.C.
BY: KEITH D. FLYNN, ESQUIRE
600 W. Lafayette Boulevard, 4th Floor
Detroit, Michigan 48226
313-964-4454
Appearing on behalf of the Plaintiff.

VARNUM, LLP
BY: TERRENCE J. MIGLIO
39500 High Pointe Boulevard, Suite 350
Novi, Michigan 48375
248-567-7400
tjmiglio@varnumlaw.com
Appearing on behalf of the Defendant.

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1 Q What's the address for Carlyle Place?
2 A It's right next-door to the Clinton Township location.
3 I'm not sure.
4 Q And how long did you live there?
5 A Two years. And I lived there alone.
6 Q Currently employed?
7 A Yes.
8 Q By whom?
9 A Leland Home Healthcare.
10 Q And what do you do for Leland Home Healthcare?
11 A I'm a home health aide.
12 Q How much do you make an hour?
13 A \$9.
14 Q How long have you been working there?
15 A Since the middle of January.
16 Q Middle of January?
17 A 2015.
18 Q Who is your supervisor?
19 A Couldn't tell you.
20 Q You don't know your supervisor's name?
21 A Nope.
22 Q Who gave you assignments?
23 A I have the same assignment every day.
24 Q Who --
25 A It -- My schedule never changes. They gave me a schedule

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1 when I first started there and I've done it ever since.
2 Q Who gave you the schedule?
3 A Her name is Gwen.
4 Q How many hours a week do you work for Leland?
5 A Between 9 to 18.
6 Q 9 to 18 hours per week?
7 A Yep.
8 Q That's the only employment you have right now?
9 A Correct.
10 Q And before you worked at Leland where did you work?
11 A Quest Diagnostics.
12 Q Which location?
13 A East China.
14 Q And what did you do for Quest Diagnostics?
15 A I was a phlebotomist.
16 Q And what was your hourly rate there?
17 A \$15 an hour.
18 Q How long did you work there?
19 A Six months.
20 Q Starting when?
21 A My last day -- It had to have been June. June, because
22 my last day was the last day of the year, December 31st.
23 Q June 2014?
24 A Hm-hmm. Yes. I'm sorry.
25 Q And how many hours a week did you work for Quest

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1 Diagnostics?

2 A 40.

3 Q What caused you to leave the employment of Quest
4 Diagnostics?

5 A I lost my house and my fiance.

6 Q What do you mean you lost your house?

7 A The modular home in Richmond was a brand-new home, it was
8 a hefty rent price a month, and due to all the issues I
9 was going through with Henry Ford, it caused a lot of
10 strain on my relationship and it ended and he left me
11 with the house. I couldn't afford it by myself, so I
12 lost the house.

13 Q Okay. So did that mean you had to leave your employment?

14 A Yeah. I didn't have a place to live, so I had to move up
15 north where the only place I had to live.

16 Q Where did you move to?

17 A My boyfriend's family's house.

18 Q I thought you said you just had a boyfriend.

19 A I lost my ex-fiance, which was Joseph Candela. My
20 boyfriend is Jim Boyer.

21 Q So when did you lose your fiance, Joseph Candela?

22 A He left in October of 2014.

23 Q Okay. And when did you find a new boyfriend?

24 A November of 2014.

25 Q How did you find your new boyfriend?

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1 A That was like 850, I believe.
2 Q And then the next place you lived was where?
3 A Before that it was Carlyle Place, which is right
4 next-door to the Clinton Township PSC.
5 Q What were you paying there in rent?
6 A 575 a month, but I lived there alone.
7 Q Where does your fiance, your ex-fiance, live now?
8 A He lives in Clinton Township at his parents' house.
9 Q Is he employed?
10 A I don't know.
11 Q Was he employed when you -- Was he employed when he was
12 your fiance?
13 A Yes.
14 Q What did he do?
15 A He was a machinist.
16 Q Do you know where he worked?
17 A What's the name of it? I don't recall the name of the
18 place he works. Hang on. Oh, I can see his T-shirts
19 right now, but . . .
20 MR. FLYNN: If you don't recall, you don't
21 recall.
22 THE WITNESS: I don't recall.
23 Q (Continuing by Mr. Miglio): So if I understand your
24 testimony, you're saying that you had to leave your
25 full-time, 40-hour-a-week job at Quest Diagnostics

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1 Q Since leaving your job -- Strike that.

2 And I'm assuming that you voluntarily resigned
3 from your position at Quest Diagnostics?

4 A I didn't have a choice.

5 Q You voluntarily -- You submitted a voluntary resignation
6 to them.

7 MR. FLYNN: Objection. Asked and answered.

8 MR. MIGLIO: Submitted a letter of resignation
9 to them?

10 MR. FLYNN: Objection. Asked and answered.

11 THE WITNESS: I had no choice.

12 Q (Continuing by Mr. Miglio): Did you submit a letter of
13 resignation?

14 A I had to move up north.

15 MR. FLYNN: Objection. Asked and answered.

16 THE WITNESS: I didn't have a house.

17 Q (Continuing by Mr. Miglio): Did you write, "I hereby
18 resign" or words to that effect?

19 MR. FLYNN: Objection. Asked and answered.

20 Q (Continuing by Mr. Miglio): Go ahead. He won't instruct
21 you not to answer.

22 MR. FLYNN: I didn't. You can answer.

23 THE WITNESS: I don't know what else to say. I
24 answered.

25 Q (Continuing by Mr. Miglio): Do you know what a letter of

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1 Q Did you ever work for anybody between the time that you
2 left Henry Ford Health System and the time you started at
3 Quest Diagnostics?

4 A No, I did not. I was on unemployment from Henry Ford.

5 (Exhibit 2 marked.)

6 Q (Continuing by Mr. Miglio): Let me show you what we've
7 marked as Exhibit No. 2 and ask you to take a look at
8 this.

9 A Okay.

10 Q Ever seen that before?

11 A I'm sure I have.

12 Q Is that your signature that appears on that?

13 A Yes.

14 Q And did you understand that you were swearing or
15 attesting to the accuracy of the answers to the
16 interrogatories?

17 A Yes, I do.

18 Q Who is Davis-Smith?

19 A Davis-Smith is the staffing service that staffs Quests
20 employees for the first six months -- Well, first three
21 months, and then you get hired in through Quest.

22 Q So you worked for Davis-Smith first before you became a
23 full-time employee for Quest.

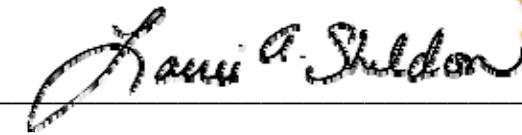
24 A Correct. It's a staffing service steppingstone that they
25 use. In order to get hired through Quest, you go through

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2 STATE OF MICHIGAN)
3 COUNTY OF MACOMB) ss:
4
5

6 I hereby certify that the foregoing attached
7 pages are a full and complete transcript of the
8 proceedings held on the date and at the place
9 hereinbefore set forth. I reported stenographically
10 the proceedings held in the matter hereinbefore set
11 forth, and the testimony so reported was
12 subsequently transcribed under my direction and
13 supervision, and the foregoing is a full, true and
14 accurate transcript of my original stenotype notes.

15 
16 
17 Lauri A. Sheldon CSR-4045, RPR

18
19 Notary Public
20 Macomb County, Michigan
21 My Commission Expires:
22 February 8, 2022
23
24
25